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23 Attorneys for Plaintiff

24 **UNITED STATES DISTRICT COURT**
25 **DISTRICT OF NEVADA**

26 NAVAJO HEALTH FOUNDATION – SAGE
27 MEMORIAL HOSPITAL, INC. (doing
28 business as “Sage Memorial Hospital”); an
Arizona non-profit corporation,

Plaintiff,

vs.

RAZAGHI DEVELOPMENT COMPANY,
LLC; a Nevada limited liability company
(doing business as “Razaghi Healthcare”),
AHMAD R. RAZAGHI; individually, TAUSIF
HASAN; individually, DOES 1-10;

Defendants.

Case No. 2:19-cv-0329-GMN-EJY

**JOINT STIPULATION TO EXTEND
TIME FOR PLAINTIFF TO RESPOND
TO DEFENDANTS’ OBJECTIONS TO
THE UNITED STATES MAGISTRATE
JUDGE’S ORDER AND REPORT AND
RECOMMENDATION**

1 The parties, by and through their respective counsel, hereby stipulate to permit Plaintiff
 2 an additional 7-days, or until March 5, 2021, to respond to Defendants' Objections to the United
 3 States Magistrate Judge's January 15, 2021 Order and Report and Recommendation. This is the
 4 parties' first request related to the matters set forth herein. The parties respectfully request that
 5 the Court approve this Stipulation. In support of this Stipulation, the parties rely upon the facts
 6 set forth below.

7 The United States Magistrate Judge assigned to this matter issued an Order and a Report
 8 and Recommendation ("Report") on January 15, 2021. ECF No. 117. Defendants filed an
 9 Objection to that Report on February 12, 2021. ECF No. 121. Pursuant to this Court's Local
 10 Rules of Civil Practice, Plaintiff is permitted a response to the Objection filed by Defendants.
 11 Plaintiff's current deadline for filing that response is February 26, 2021. Undersigned counsel,
 12 however, has notified undersigned defense counsel that he is required to travel out-of-town this
 13 week for a work-related matter. This travel was unanticipated and undersigned counsel did not
 14 expect at the start of this week to being out-of-town. Nonetheless, and in light of this fact, a
 15 short extension of the current deadline will be necessary to permit Plaintiff's counsel sufficient
 16 time to complete a response and file it with the Court. Undersigned counsel for Defendants has
 17 no objection to the requested extension of one week.

18 For the reasons set forth above, the parties respectfully approve this Stipulation and
 19 permit Plaintiff to file a response to Defendants' Objections on or before March 5, 2021.

20 /s/ Kris Leonhardt

/s/ Paul S. Padda

21
 22 Pavneet S. Uppal, Esq.
 23 Kris Leonhardt, Esq.
 24 Brian L. Bradford, Esq.

Kathleen Bliss, Esq.
 Paul S. Padda, Esq.
 David Stander, Esq.
 Douglass A. Mitchell, Esq.


Counsel for Defendants

*Counsel for Christi El-Meligi,
 Netrishia Dalgai and Navajo Health
 Foundation – Sage Memorial
 Hospital, Inc.*

25 Dated: February 25, 2021

Dated: February 25, 2021

27 **IT IS SO ORDERED.**

28 
 U.S. MAGISTRATE JUDGE

Dated: February 25, 2021